

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

ROBERT HOULE

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 13, 2241(c),  
2243(a), 2244(a)(5), and 1153; and  
N.D.C.C. §§ 14-09-22 and 12.1-32-01

**COUNT ONE**

**Aggravated Sexual Abuse**

The Grand Jury Charges:

From in or about 2016 and continuing until on or about August 14, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

ROBERT HOULE,

an Indian, did knowingly engage in and attempt to engage in a sexual act with a person who had not attained the age of 12 years, namely S.H., and the sexual act consisted of: (i) contact between the penis and the vulva; and (ii) the intentional touching, not through the clothing, of the genitalia of another person who has not attained the age of 16 years with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person;

In violation of Title 18, United States Code, Sections 2241(c) and 1153.

COUNT TWO

**Abusive Sexual Contact**

The Grand Jury Further Charges:

From in or about 2016 until on or about August 14, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

ROBERT HOULE,

an Indian, did knowingly engage in and attempt to engage in sexual contact with another person, namely, S.H., an Indian child, who had not attained the age of 12 years, and the sexual contact consisted of the touching, directly and through the clothing, of the genitalia of S.H., with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person;

In violation of Title 18, United States Code, Sections 2244(a)(5) and 1153.

COUNT THREE

**Sexual Abuse of a Minor**

The Grand Jury Further Charges:

From on or about August 15, 2020, and continuing through July 2021, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

**ROBERT HOULE,**

an Indian, did knowingly engage in and attempt to engage in a sexual act with another person, namely, S.H., a child who, at the time of the sexual act, had attained the age of twelve (12) years but had not attained the age of sixteen (16) years, and, at the time of the sexual act, S.H. was at least four (4) years younger than ROBERT HOULE, and the sexual act consisted of: (i) contact between the penis and the vulva; and (ii) the intentional touching, not through the clothing, of the genitalia of another person who has not attained the age of 16 years with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person;

In violation of Title 18, United States Code, Sections 2243(a) and 1153.

COUNT FOUR

**Child Abuse in Indian Country**

The Grand Jury Further Charges:

From in or about 2016 and continuing through July 2021, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

ROBERT HOULE,

an Indian, was the parent, guardian, custodian, and adult family and household member of S.H. (YOB 2008), an Indian child, and willfully inflicted mental and bodily injury upon S.H.;

In violation of Title 18, United States Code, Sections 13 and 1153; and North Dakota Century Code, Sections 14-09-22 and 12.1-32-01.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Nicholas W. Chase

NICHOLAS W. CHASE

United States Attorney

DMD/vt